

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

DURA AUTOMOTIVE SYSTEMS, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 19-12378-KBO

Jointly Administered

**SECOND SUPPLEMENTAL DECLARATION OF OSCAR N. PINKAS IN
CONNECTION WITH THE APPLICATION FOR ENTRY OF AN ORDER
AUTHORIZING THE EMPLOYMENT AND RETENTION OF COUNSEL TO THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS *NUNC PRO TUNC* TO
NOVEMBER 1, 2019**

STATE OF NEW YORK

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ss:

COUNTY OF NEW YORK

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Pursuant to section 1746 of title 28 of the United States Code, I, Oscar N. Pinkas, hereby declare under penalty of perjury that the following is true to the best of my knowledge, information, and belief:

1. I am a partner of the law firm of Dentons US LLP (“Dentons”) which maintains offices at, among other locations, 1221 Avenue of the Americas, New York, New York 10020.

2. This supplemental declaration (the “Supplemental Declaration”) is being submitted in connection with the Application for Entry of an Order Authorizing the Employment and Retention of Counsel to the Official Committee of Unsecured Creditors (the “Committee”) *Nunc*

¹ The debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity’s federal tax identification number, are: Dura Automotive Systems Cable Operations, LLC (7052); Dura Automotive Systems, LLC (8111); Dura Fremont L.L.C. (1252); Dura G.P. (8092); Dura Mexico Holdings, LLC (4188); Dura Operating, LLC (2304); and NAMP, LLC (3693).

Pro Tunc to November 1, 2019 [D.I. 354] (the “Application”). I make this declaration pursuant to sections 328 and 1103 of title 11 of the United States Code (the “Bankruptcy Code”), Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 2014-1 of the Local Rules for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”).

3. Unless otherwise stated, I have personal knowledge of the facts set forth hereinafter.

4. On November 25, 2019, the Committee filed the Application. In support of the Application, the Committee filed the Declaration of Oscar N. Pinkas in Support of Application for Entry of an Order Authorizing the Employment and Retention of Counsel to the Official Committee of Unsecured Creditors *Nunc Pro Tunc* to November 1, 2019 (the “Original Declaration”), which was attached to the Application as Exhibit A. On December 30, 2019, the Committee filed a supplemental declaration in support of the Application regarding compliance with “Large Case Fee Guidelines” [D.I. 494].

5. In connection with the Application and all declarations in support thereof, I submit this Supplemental Declaration to provide additional disclosures in accordance with Bankruptcy Rules 2014(a) and 2016(b) and as required under the proposed form of order.

6. In the Original Declaration, I disclosed Dentons’ billing rates in effect at that time for matters related to these chapter 11 cases. I also disclosed that the billing rates are subject to periodic adjustments to reflect economic and other conditions.

7. In accordance with ordinary practice, some billing rates for Dentons professionals will change effective as of on or about January 1, 2020. The rates will change due to rate changes and/or promotions occurring in the ordinary course of business. Dentons’ billing rates that will take effect on or about January 1, 2020 for matters related to these chapter 11 cases range as follows:

Billing Category	US Range (excluding BGD) ²
Partners, Special Counsel and Counsel	\$990 - \$1310
Associates	\$555 - \$755
Paraprofessionals	\$355 - \$380

Dated: December 31, 2019

/s/ Oscar N. Pinkas

Oscar N. Pinkas

Partner, Dentons US LLP

*Proposed Counsel to the
Official Committee of Unsecured Creditors*

² In October of 2019, Dentons' partners voted to approve a combination with Bingham Greenebaum Doll LLP ("BGD"). BGD will file a separate rate notice.